

## REMARKS

### I. Status of the Claims

Claims 1-20 were pending in the application. Claims 1-2, 4-12, and 14-20 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over PCT/US97/08269 (WO 97/44912) to Andrews ("Andrews") in view of U.S. Patent No. 5,410,141 to Koenck et al. ("Koenck"). Claims 3 and 13 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Andrews and Koenck in further view of U.S. Patent No. 6,283,777 to Canova et al. ("Canova").

The Action indicates that if Claims 1-10 were found allowable, Claims 11-20 would be objected to under 37 C.F.R. 1.75 as being a substantial duplicate thereof. In response, Claims 1-10 have been canceled. Claims 13-18 and 20 have been amended to correct claim dependencies.

Based on the comments below, Applicants submit that Claims 11-20 are patentable over the cited art and request that a Notice of Allowance be issued in due course.

### II. The Section 103 Rejections

Claim 11 recites a radio communication terminal including:

- a user input and output interface;
- a terminal core including a main terminal printed circuit board carrying electronic circuits with a data processor for controlling terminal functions, a display, and a system connector;
- a cover connector connected to the data processor; and
- a releasable cover carrying an auxiliary functional member and a terminal connector connected to the auxiliary functional member;

wherein the cover connector and terminal connector are configured to provide a communicative connection for the auxiliary functional member of the cover to the data processor of the terminal core,

wherein the terminal core comprises an additional keyboard printed circuit board supporting a terminal keyboard, connected to the electronic circuits, and wherein the cover connector is disposed on the additional printed circuit board, wherein the display is connected to the main terminal printed circuit board so that the releasable cover is

configured to be removed from the main terminal printed circuit board and from the display.

Claim 19 is directed to a terminal core and recites that "the cover connector and terminal connector are configured to provide a communicative connection for the auxiliary functional member of an attached cover to the data processor of the terminal core, wherein the terminal core comprises an additional keyboard printed circuit board supporting a terminal keyboard, connected to the electronic circuits, and wherein the cover connector is disposed on the additional printed circuit board, wherein the display is connected to the main terminal printed circuit board."

Applicants submit that neither reference teaches or suggests numerous recitations of the claims, including at least the above underlined recitations.

In particular, the Action identifies the contacts **52** of **Figure 2** and the keypad **18** of **Figure 1** of Andrews as equivalent to the cover connector and the auxiliary functional member, respectively, of the current claims. However, the contacts **52** (identified as the cover connector) do not provide a communicative connection for the keypad **18** (identified as the auxiliary functional member) of an attached cover to the data processor of the terminal core as recited in Claims 11 and 19. Instead, as shown in **Figure 2** of Andrews, the contacts **52** align with four pins on a jumper **60**. When a front cover **44** is in place, jumper pins **64** on the cover **44** engage respective contacts **52**. A detection circuit **50** varies its output based on which contacts **52** are engaged by the pins **64**. The microprocessor **12** reads the resulting signal from the detection circuit **50** to identify a front cover configuration, which indicates which cell phone model front cover **44** is in place so that selected configuration data can be used to control the operation of the phone. *See* Andrews, page 12, lines 8 – page 13, line 16. Therefore, the contacts **52** do not provide a communicative connection for the keypad **18** to the data processor of the terminal core.

This omission is not remedied by Koenck. In fact, the Action does not identify any portion of Koenck as disclosing a cover connector in its discussion of Koenck on page 4 of the Action.

In addition, neither reference teaches or suggests that the cover connector is disposed on an additional keyboard printed circuit board as recited in Claims 11 and 19. The Action

concedes that Andrews does not disclose that the terminal core includes an additional keyboard printed circuit board. Although the Action states that contacts **52** are disposed on the printed circuit board in **Figure 10** of Andrews (*see* the Action, page 4), Andrews merely proposes a single printed circuit board **48**. *See* Andrews, **Figure 2**. Nothing in Andrews teaches or suggests that the contacts **52** (which are identified as the cover connector) are disposed on an additional keyboard printed circuit board that is separate from a main terminal printed circuit board. Accordingly, the contacts **52** of **Figure 2** in Andrews cannot meet the recitation that the cover connector is disposed on the additional printed circuit board as recited in Claims 11 and 19.

This recitation is also not taught by Koenck. The Action states that Koenck discloses that the terminal core includes "an additional keyboard printed circuit board supporting a terminal keyboard (Fig. 2, reference 41);" however, Koenck does not disclose a cover connector that is disposed on the additional circuit board as recited in Claims 11 and 19. As discussed above, the discussion of Koenck on page 4 of the Action does not identify any portion of Koenck as disclosing a cover connector. Therefore, at least the recitation that the cover connector is disposed on the additional printed circuit board is not taught or suggested by either Andrews or Koenck.

In view of the foregoing, Applicants respectfully submit that the cited references fail to teach or suggest the subject matter of independent Claims 11 and 19 and Claims 12-18 and 20 depending therefrom. For at least these reasons, Applicants request that the rejections based on § 103 be withdrawn.

### **III. Conclusion**

Applicants respectfully submit that, for the reasons discussed above, the references cited in the present rejections do not disclose or suggest the present invention as claimed. Accordingly, Applicants respectfully request allowance of all the pending claims and passing this application to issue. If further informalities are noted, the Examiner is encouraged to contact the undersigned by telephone to expedite allowance of the present application.

In re: Frohlund et al  
Serial No.: 10/521,047  
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Respectfully submitted,

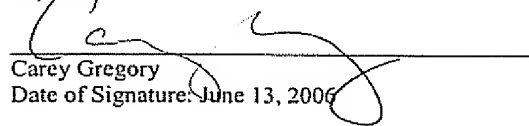


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